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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMON AVENDANO-SOTO,

Defendant.

2:20-cr-00003-APG-EJY

**Stipulation to Extend Delivery of In-
Camera Materials**

(first request)

It is stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney; Kevin D. Schiff, Assistant United States Attorney, counsel for the United States of America and Raquel Lazo, Assistant Federal Public Defender, counsel for defendant Avendano-Soto:

That the Government's deadline of October 15, 2020, to deliver materials to the chambers of the Honorable Elayna J. Youchah for an in-camera inspection, be extended 30 days. *See* ECF No. 64. The Government is acquiring the materials, but learned the records regarding the confidential informant (CI) are kept at a Drug Enforcement Administration (DEA) office in Virginia. A request has been issued to the office to supply the records, but it is not anticipated they will arrive prior to October 15, 2020.

1 Further, the Court has ordered transcriptions of the communications between
2 the CI and Avendano-Soto. Although the Government and defense have the raw audio and
3 text messages of these contacts, these communications are in the Spanish language. The
4 DEA has requested translators do a transcription of these communications, but again it is
5 not expected they will be ready prior to the October 15, 2020 deadline.

6 Finally, the defense believes they are lacking discovery and do not have all
7 relevant communications between the CI and Avendano-Soto. In an attempt to ensure the
8 parties have all relevant information, undersigned counsel and defense counsel met with
9 the DEA case agent on October 14, 2020. The DEA has agreed to acquire the CI's phone
10 and download any relevant materials relating to this case. As this phone is currently not in
11 the custody of the DEA, it is expected this process may take two to three weeks. Any
12 relevant materials discovered on the phone will either be provided directly to the defense,
13 or will be submitted for the in-camera inspection.

14 DATED this 14th day of October, 2020.

15 NICHOLAS A. TRUTANICH
16 United States Attorney

17 /s/ Kevin Schiff
Kevin D. Schiff
Assistant United States Attorney

18 /s/ Raquel Lazo
19 Raquel Lazo, Esq.
20 Counsel for Defendant

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23 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
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1 UNITED STATES OF AMERICA,

2:20-cr-0003-APG-EJY

2 Plaintiff,

**Order Pursuant to Stipulation of the
Parties**

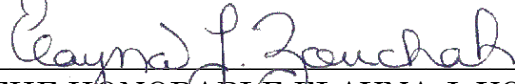
3 vs.

4 RAMON AVENDANO-SOTO,

5 Defendant.

6 Based on the pending Stipulation of counsel, and good cause appearing therefore,
7 the Court extends the deadline for the Government to submit the materials identified in
8 ECF No. 64 for in-camera inspection to this Court to November 12, 2020.

10 IT IS SO ORDERED

11 
12 THE HONORABLE ELAYNA J. YOUCHAH
13 UNITED STATES MAGISTRATE JUDGE

14 DATED: October 15, 2020
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